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In the Final Office Action of August 14, 2006, claims 1-20 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Patent Application No. US 2002/0043926 A1 ("Takahashi et al."). In response, Applicant respectfully asserts that each element of the independent claims 1, 8 and 14 is not disclosed in Takahashi et al., as explained below. Consequently, the independent claims 1, 8 and 14 cannot be anticipated by Takahashi et al. Thus, Applicant respectfully requests that the independent claims 1, 8 and 14, as well as the dependent claims 2-7, 9-13 and 15-20, be allowed.

A. Patentability of Independent Claims 1 and 8

The Final Office Action has again rejected the independent claim 1 under 35 U.S.C. §102(b) as allegedly being anticipated by Takahashi et al. However, the cited reference of Takahashi et al. does not disclose the claimed limitations of "*the light source including a fluorescent layer having a property to convert some of said original light into first converted light*" and "*a wavelength-conversion region optically coupled to said light source to receive some of said original light and said first converted light, said wavelength-conversion region including a fluorescent material having a property to convert some of said original light into second converted light.*" Consequently, the independent claim 1 is not anticipated by Takahashi et al.

In response to Applicant's previous remarks, the latest Office Action on page 6 states that "Takahashi discloses that the wavelength conversion region (item 35) 'CAN BE OMITTED' (paragraph 97) with the fluorescent layer (item 37)." The Office Action then asserts that "Takahashi teaches that the wavelength conversion region can be kept since it can be omitted." Applicant respectfully disagrees with this interpretation, as explained below.

The cited reference of Takahashi et al. describes an LED unit 1 with an epoxy resin 35 containing fluorescent materials 36, which is shown in Fig. 1. Takahashi et al. then states in paragraph [0097] that "[i]n the LED unit 1, a fluorescent layer 37

with which the substrate surface of the light-emitting device 10 is covered maybe provided as shown in FIG. 6A or 6B so that the fluorescent resin 35 can be omitted" (emphasis added). Clearly, when read in its entirety, the above sentence implies that the fluorescent layer 37 is provided so that the fluorescent resin 35 is replaced. Such interpretation is further supported by the fact that Takahashi et al. in paragraph [0098] states that "[a] light-transmissible material (such as epoxy resin, silicone resin, urea resin, glass or the like) containing the fluorescent materials 36 dispersed therein can be used as the fluorescent layer 37." No other possible fluorescent material is disclosed. The use of the same fluorescent materials 36 in both the epoxy resin 35 and the fluorescent layer 37 suggests that these two elements are alternatives since having both the epoxy resin 35 and the fluorescent layer 37 would be redundant and unnecessary. Therefore, the cited reference of Takahashi et al. does not disclose the claimed limitations of "*the light source including a fluorescent layer*" AND "*a wavelength-conversion region optically coupled to said light source*." Consequently, the independent claim 1 cannot be anticipated by Takahashi et al. As such, Applicant respectfully requests that the independent claim 1 be allowed.

Furthermore, the claimed "fluorescent layer" is described as "*having a property to convert some of said original light into first converted light*" and the claimed "wavelength-conversion region" is described as "*including a fluorescent material having a property to convert some of said original light into second converted light*." However, since both the epoxy resin 35 and the fluorescent layer 37 of Takahashi et al. include the same fluorescent materials 36, the epoxy resin 35 and the fluorescent layer 37 would convert the light from the light-emitting device 10 into the same converted light. Thus, the cited reference of Takahashi et al. does not disclose these claim limitations, which further supports the conclusion that the independent claim 1 is not anticipated by the cited reference of Takahashi et al.

The independent claim 8 was also rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Takahashi et al. The independent claim 8 recites in part "*converting some of said original light into first converted light within said light source*" and "*converting some of said original light into second converted light outside of said light source*." As explained above, the cited reference of Takahashi et al. disclose a device with the fluorescent layer 37 OR the fluorescent resin 35.

Consequently, the cited reference of Takahashi et al. does not disclose “converting some of said original light into first converted light within said light source” AND “converting some of said original light into second converted light outside of said light source,” as recited in the independent claim 8. Thus, Applicant respectfully asserts that the independent claim 8 is not anticipated by Takahashi et al., and requests that the independent claim 8 be allowed.

B. Patentability of Independent Claim 14

The Final Office Action has also rejected the independent claim 14 under 35 U.S.C. §102(b) as allegedly being anticipated by Takahashi et al. However, the cited reference of Takahashi et al. does not disclose the claimed limitations of “*said semiconductor die including a fluorescent substrate*” and “*a wavelength-conversion region*.” Consequently, the independent claim 14 is not anticipated by Takahashi et al.

As explained above in section A, the cited reference of Takahashi et al. disclose a device with the fluorescent layer 37 OR the fluorescent resin 35. Consequently, the cited reference of Takahashi et al. does not disclose the claimed limitations of “*said semiconductor die including a fluorescent substrate*” and “*a wavelength-conversion region*.” Thus, the independent claim 14 is not anticipated by Takahashi et al. for at least the same reasons as the independent claim 1.

Furthermore, the cited reference of Takahashi et al. does not disclose the claimed limitation of “*said semiconductor die including a fluorescent substrate*.” The latest Office Action on page 4 states that the cited reference of Takahashi et al. discloses “the semiconductor die including a fluorescent substrate (FIG. 6A, item 37).” However, the referenced item 37 described in Takahashi et al. is not a substrate, as asserted in the Office Action. The cited reference of Takahashi et al. states in paragraph [0097] that “a fluorescent layer 37 with which the substrate surface of the light-emitting device 10 is covered maybe provided as shown in FIG. 6A or 6B so that the fluorescent resin 35 can be omitted.” In addition, the cited reference of Takahashi et al. further states in paragraph [0097] that “FIG. 6B shows the case where the surface of the substrate and the side surfaces of the light-emitting device 10 are

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covered with the fluorescent layer 37." The above sentences clearly show that the fluorescent layer 37 is not a substrate, rather a layer covering the substrate 11 of the light-emitting device 10. The item 11 is referred to as the substrate of the light-emitting device 10 in paragraph [0068] of Takahashi et al. Consequently, the cited reference of Takahashi et al. does not disclose "*said semiconductor die including a fluorescent substrate,*" as recited in the independent claim 14. Thus, Applicant respectfully asserts that the independent claim 14 is not anticipated by Takahashi et al., and requests that the independent claim 14 be allowed.

B. Patentability of Dependent Claims 2-7, 9-13 and 15-20

Each of the dependent claims 2-7, 9-13 and 15-20 depends on one of the independent claims 1, 8 and 14. As such, these dependent claims include all the limitations of their respective base claims. Therefore, Applicant submits that these dependent claims are allowable for at least the same reasons as their respective base claims.

Applicant respectfully requests reconsideration of the claims in view of the remarks made herein. A notice of allowance is earnestly solicited.

Respectfully submitted,

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